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September 28, 2022

BY ECF

Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Herrera-Amador et al. v. City of New York, et al.,
16 CV 05915 (NGG) (VMS)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O Hinds-Radix, Corporation Counsel of the City of New York, and one of the attorneys representing defendants Police Officer Kevin Lee and Detective Kevin Arias in the above-referenced action. In that capacity, I write jointly with plaintiff's counsel, Lauriano Guzman, Esq., to propose a briefing schedule for motions *in limine*. The parties propose that any motions *in limine* be filed on or before January 27, 2023, with oppositions, if any, due on or before February 10, 2023.

Additionally, defendants write in response to the Court's September 8, 2022 Order to advise the Court that we do object to a vaccinated jury. Defendants can elaborate on the position should that be necessary.

Thank you for your consideration.

Respectfully submitted,

/s/

Brian Francolla
Senior Counsel
Special Federal Litigation Division

cc: Lauriano Guzman Jr., Esq. (by ECF)